

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA ECF**

June 19, 2019

The Honorable Sarah Netburn  
 Thurgood Marshall United States Courthouse  
 40 Foley Square, Room 430  
 New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Netburn:

We write to advise the Court that Plaintiffs will be filing a response to the letter emailed to the Court under seal yesterday afternoon by Michael Kellogg, counsel for the Kingdom of Saudi Arabia, regarding Plaintiffs' pending Motion to Compel. As plaintiffs will address in further detail in their response, the Kingdom's letter is misleading in its characterization of the submitted testimony and its omission of other testimony and evidence, and fails entirely to address significant and glaring credibility issues.

There are errors in the rough drafts of the depositions cited by Mr. Kellogg, and we would prefer to file our response one business day after the certified transcripts are available next week. Otherwise, if the Court desires, we will respond this Friday, pursuant to this Court's Rules for letter motions.

Hon. Sarah Netburn  
June 19, 2019  
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Respectfully submitted,

COZEN O'CONNOR

/s/ Sean P. Carter, Esquire

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On behalf of the MDL 1570 Plaintiffs'  
Exec. Committee for Commercial Claims

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On behalf of the MDL 1570 Plaintiffs'  
Exec. Committee for Personal Injury and  
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/s/ Steven R. Pounian, Esquire

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On behalf of the MDL 1570 Plaintiffs'  
Exec. Committee for Personal Injury and  
Death Claims

cc: The Honorable George B. Daniels  
All Counsel of Record via ECF